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VIA ELECTRONIC MAIL

Re: **State of Oklahoma v. Tyson, et al.** U.S. District Court for the Northern District of
Oklahoma Case No. 05-CV-00329-GKF-SAJ

Dear Theresa:

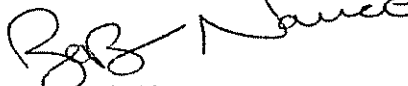
We have received your letter of August 27, 2007 in which you express your reluctance to consolidate your proposed Rule 30(b)(6) depositions of the State with the other Defendants in order to save time and expense for the State, and, for that matter, the Defendants. Your principal reason is that you intend to ask questions specific to the Cargill Defendants, and that no economies could be achieved by consolidating the deposition with those of other Defendants who would presumably want to ask similarly defendant specific questions.

We disagree with your reasoning. Many of the "Cargill specific" areas of inquiry you propose for the State will receive similar answers based upon the nature of the State's case. This process has been previewed in the extensive and overlapping written discovery to which the State has already responded. We urge you to reconsider your position and to join us in approaching the other Defendants in order to consolidate these depositions on reasonable terms which economically meet the needs of all of the parties.

We make this proposal without waiving any objections to or relief from the Rule 30(b)(6) notices which the Cargill Defendants have served upon the State.

Please advise if your clients are willing to reconsider your position and join us in formulating a reasonable and economical approach which will not result in serial deposition of the State's witnesses.

Sincerely,


Robert A. Nance
FOR THE FIRM